

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Court No.: 14-cr-10260-MLW
	)	
GLENN A. CHIN,	)	
	)	
Defendant.	)	
_____	)	

**PROTECTIVE ORDER**

Upon consideration of the Government's Assented-To Motion for a Protective Order in connection with documents and information to be disclosed to the defendant in this case (hereinafter referred to as the "discovery materials"), it is hereby:

**ORDERED** that defense counsel of record shall keep the discovery materials strictly confidential and shall not disclose information contained therein to any person other than the defendant, defense counsel of record, and agents of defense counsel, that is, those employed by defense counsel and any other persons retained and/or consulted by defense counsel for the purpose of assisting in the legal defense of this case, and such information shall be used only for purposes of this litigation including as necessary during discovery and preparation for trial;

**FURTHER ORDERED** that, should defense counsel of record conclude that, in order to prepare for trial in this case, he needs to disclose information contained in the discovery materials beyond the disclosure authorized by this Order, or contact any of the individuals or companies referenced in the discovery materials other than the defendant, he first will consult with attorneys for the government in order to determine whether such disclosure could jeopardize an ongoing criminal investigation; and the parties may agree in writing to such

disclosure without amendment of this Order or defense counsel of record may seek leave of the Court to amend this Order;

**FURTHER ORDERED** that as to all persons who are provided access to information in the discovery materials, as authorized by this Order, in connection with the preparation and defense of this matter, defense counsel of record shall advise each of these persons of the privacy and confidentiality of such information and his or her obligation not to disclose the information, and require such person to sign a copy of this Order to affirm his or her understanding of such person's obligation not to disclose the information before such information is disclosed, except that a signed copy of this Order will be deemed to apply to any support or administrative staff working under the direction and supervision of the signer;

**FURTHER ORDERED** that counsel of record shall maintain all copies of this Order that have been signed under the preceding provision until the conclusion of this litigation, including all appeals;

**FURTHER ORDERED** that no person, including the defendant, who receives discovery materials from the defense counsel of record is permitted to further disseminate or further disclose any such materials, or information in them, for any purpose; and

**FURTHER ORDERED** that at the conclusion of this litigation, including all appeals, all discovery materials shall be returned to the United States Attorney's Office, or destroyed at the direct of the United States Attorney's Office.

SO ORDERED, this \_\_\_ day of October, 2014.

---

THE HONORABLE JENNIFER C. BOAL  
UNITED STATES CHIEF MAGISTRATE JUDGE

**AGREEMENT TO BE BOUND BY PROTECTIVE ORDER**

I hereby acknowledge that I have read the protective order entered in United States v. Glenn A. Chin, No. 14-CR-10260-MLW, and/or that I have had the terms of the protective order explained to me. I agree that the order applies to me and that I am bound by, and will comply with, its terms.

\_\_\_\_\_  
NAME

\_\_\_\_\_  
DATE